

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : No. 1:23-bk-00988-HWV
UPTOWN PARTNERS, LP :
Debtor : Chapter 11
:

**CONCURRED IN MOTION OF UPTOWN PARTNERS, LP TO CONTINUE
HEARING ON THE MOTION OF LANDEX MANAGEMENT, LLC
REQUESTING ORDER COMPELLING DEBTOR TO ASSUME OR REJECT
EXECUTORY CONTRACT PURSUANT TO 11 U.S.C.A. SECTION 365(d)(2)
AND FOR OTHER RELIEF**

Uptown Partners, LP, d/b/a Residences at Governor's Square, a/k/a Governor's Square Apartments ("Debtor" or "Uptown Partners") by and through its counsel, Cunningham, Chericoff & Warshawsky, P.C., files this Motion of Landex Management, LLC Requesting Order Compelling Debtor to Assume or Reject Executory Contract Pursuant to 11 U.S.C.A Section 365(d)(2) and for Other Relief, is as follows:

1. On May 2, 2023, the Debtor filed a voluntary Chapter 7 Petition under the United States Bankruptcy Code.
2. Following a Motion filed by the Debtor, on September 12, 2023, the Court entered an Order converting the case to a case under Chapter 11 of the United States Bankruptcy Code.
3. On May 2, 2024, Barry Solodky, counsel for Landex Management filed a Motion of Landex Management, LLC Requesting Order Compelling Debtor to Assume or Reject Executory Contract Pursuant to 11 U.S.C.A Section 365(d)(2) and for Other Relief (the "Reject Motion") [Doc 144].

4. Debtor's Counsel filed an answer to the above-referenced Motion on May 9, 2024.

5. On May 30, 2024, Debtor's Counsel filed a Request to Continue the Hearing scheduled for June 4, 2024. This hearing was rescheduled to July 9, 2024.

6. Currently, the next Hearing on the Reject Motion is scheduled for September 10, 2024, at 11:00 a.m.

7. The Movant and Debtor desire to have the hearing on the Motion to be held as the same time and date as the hearing on the Sale of the Debtor's Real Property.

8. This Motion is concurred in by the Movant.

WHEREFORE, Debtor, Uptown Partners, LP respectfully requests that this Honorable Court continue the hearing on the Motion of Landex Management, LLC Requesting Order Compelling Debtor to Assume or Reject Executory Contract Pursuant to 11 U.S.C.A Section 365(d)(2) and for Other Relief currently scheduled for September 10, 2024, at 11:00 a.m. to November 5, 2024, and award the Debtor such other and further relief as is just and proper.

Respectfully submitted:

CUNNINGHAM, CHERNICOFF
& WARSHAWSKY, P.C.

By: /s/ Robert E. Chernicoff
Robert E. Chernicoff, Esquire
Attorney I.D. No. 23380
2320 North Second Street
P. O. Box 60457
Harrisburg, PA 17106-0457
(717) 238-6570

Date: September 4, 2024